EPA SECTION 508 COMPLIANCE ASSESSMENT AND REMEDIATION PLAN

Assessing and Remediating the Accessibility of EPA's Information and Communication Technology

EPA's Section 508 Program
Office of Enterprise Information Programs
Office of Environmental Information

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Introduction

Background

Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794d), as amended by Section 255 of the Communications Act, requires federal agencies to develop, procure, maintain and use information and communication technology (ICT) that is accessible to individuals with disabilities. On January 18, 2017, the Access Board published a <u>final rule</u> that updated the Section 508 requirements for the federal government's information and communication technology (ICT).

ICT is defined as:

"Information technology and other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any associated content. Examples of ICT include, but are not limited to: computers and peripheral equipment; information kiosks and transaction machines; telecommunications equipment; customer premises equipment; multifunction office machines; software; applications; Web sites; videos; and, electronic documents."

Federal agencies are not required to comply with the updated Section 508 standards immediately. The Rehabilitation Act gives the Federal Acquisition Regulatory Council (FAR Council) and federal agencies up to six months to incorporate the updated Section 508 standards into their respective acquisition regulations and procurement policies and directives. The FAR Council also establishes the date by which new and existing ICT must meet the updated Section 508 standards. All other ICT must comply with the updated Section 508 Standards beginning on January 18, 2018 (i.e., one year after publication of the final rule in the Federal Register), unless the existing ICT meets the Safe Harbor Provision. ¹² Until the updated 508 standards take effect, the original Section 508 standards serve as the standard for all Section 508-covered ICT.

Purpose

In response to the Access Board's final rule, EPA's Section 508 Executive Council will implement a Compliance Assessment and Remediation Plan to determine and enhance the Section 508 compliance and accessibility of EPA's ICT.

The expected outcomes of the plan are to help EPA:

- 1. Inventory the universe of EPA ICT and prioritize ICT for assessments
- 2. Assess the priority ICTs' compliance
- 3. Develop and implement remediation plans to address Section 508 compliance and accessibility concerns identified during the assessments
- 4. Report on EPA's Section 508 activities and compliance to the Office of Management and Budget (OMB)

¹ Under the Safe Harbor Provision, any ICT that is currently compliant with the original standards and will not be "altered" on or after January 18, 2018, does not need to be brought into compliance with the revised standards. Efforts to improve the compliance of Agency ICT should focus on ICT that are non-compliant or are compliant to the original standards, but will be changed after January 18, 2018.

² The U.S. Access Board defines "alteration" as "a change to existing ICT that affects interoperability, the user interface, or access to information or data."

The plan will be implemented in parallel with EPA's efforts to revise its policies and procedures governing Section 508 at the Agency. The revised information directives will incorporate the requirements of the revised Section 508 standards in an effort to:

- Establish processes for maintaining and assessing Agency ICT
- Allow the EPA Section 508 Program to measure and report to OMB on the accessibility of Agency ICT, using the baseline developed through the Assessment Plan.

This plan is a living document and may be revised as each phase is further defined and implemented.

Scope

Regardless of whether the ICT meets the Safe Harbor Provision, the plan applies to EPA ICT that meets the following conditions:

- The ICT is used by the public
- The ICT will be used by many employees and/or contractors within the Agency (e.g., all or most employees within a specific region or program office; all EPA managers and supervisors; a facility-wide scanning station or copier)
- The ICT is essential to performing job duties (e.g., a database that employees working within a specific program or job classification must use to complete essential job duties)

The plan does not apply to the following ICT:

- The ICT falls under an approved Section 508 exception³
- The ICT has an approved undue burden justification on file with the Section 508 Program or is in process of receiving approval⁴

The plan applies to the following types of internal communications:

- 1. Emergency notifications
- 2. Decisions adjudicating administrative claims or proceedings
- 3. Program or policy announcements
- 4. Human Resource (HR) notices
- 5. Formal acknowledgements of receipt
- 6. Survey questionnaires
- 7. Templates and forms
- 8. Educational and training materials
- 9. Intranet content designed as webpages

The plan applies to all 14 public domain websites registered to EPA.

- 1. airnow.gov
- 2. e-enterprise.gov

³ ICT that falls under an exception is considered compliant with the requirements of Section 508 of Rehabilitation Act.

⁴ Undue burden is defined by the Access Board and the FAR as a significant difficulty or expense that an agency would experience in acquiring ICT that meets all or part of the applicable Section 508 standards. A rarely used approach, the Agency must consider all resources available to the program or regional office acquiring the ICT; document the undue burden determination; and make every effort to provide alternate means of access to the ICT, if approved by the appropriate AA/ARA.

- 3. energystar.gov
- 4. epa.gov
- 5. fdms.gov
- 6. fedcenter.gov
- 7. frtr.gov
- 8. greengov.gov
- 9. regulations.gov
- 10. relocatefeds.gov
- 11. sustainability.gov
- 12. tox21.gov
- 13. urbanwaters.gov
- 14. FOIAonline.gov

Approach and Timeline

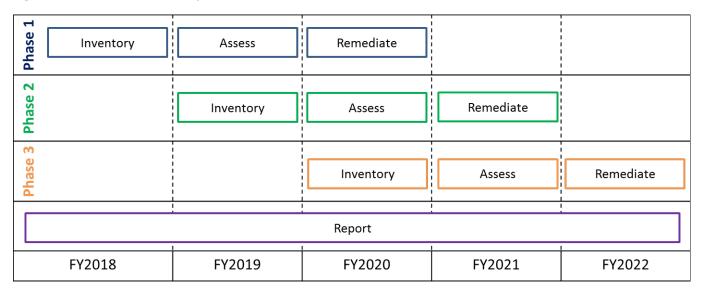
The EPA Section 508 Executive Council, supported by the EPA Section 508 Program and the EPA Section 508 Liaisons, will lead the implementation of this plan. The overall goal of the plan to assess and enhance the accessibility of EPA's existing ICT, while also developing a baseline from which to measure improvements and providing a framework for focusing EPA's Section 508 efforts over the next few years. EPA offices that are developing or updating systems should test those systems for Section 508 compliance and remediate any deficiencies.

The plan provides a phased approach for identifying/prioritizing, assessing, and remediating the Agency's ICT for Section 508 compliance and accessibility. Each phase focuses on certain types of ICT, and includes the following activities:

- 1. An inventory and prioritization of EPA ICT to be assessed for Section 508 compliance and accessibility
- 2. Assessments of the ICTs' Section 508 compliance and accessibility
- 3. Development and implementation of remediation plans to address Section 508 compliance and accessibility concerns identified during the assessments
- 4. Reporting to the Section 508 Program on the inventory/prioritization, assessment, and remediation activities completed
- 5. The Section 508 Program will incorporate EPA program/regional office reporting information into the Agency's biannual Section 508 report to the Office of Management and Budget.

Figure 1 provides a high-level overview of the target timeframes for each phase and activity of the plan. EPA program/regional offices are expected to move forward within a phase as soon as feasible. Program/regional offices will generally be expected to complete each major activity (inventory, assessment, or remediation) within a phase within one year.

Figure 1. The Section 508 Compliance Assessment and Remediation Plan



Internet and Intranet ICT

The approach and timeline for EPA's Internet and intranet sites will be iterative, with a focus on process improvement. Because of the dynamic nature of websites and electronic documents, the inventory, assessment and remediation of Internet and intranet ICT will follow a different process than is outlined in the plan for other types of ICT. Internet and intranet Section 508 compliance and remediation activities will be coordinated with the OEI Office of Information Management (OIM) and the EPA Web Council. The assessment for the Internet will be completed with the assistance of reports provided by the General Services Administration (GSA).

Activity 1: Inventory of EPA's Information and Communication Technology

Each phase will begin with an inventory of the ICT that meets criteria outlined in Table 1. Phase Criteria, below.

Table 1. Phase Criteria

| Phase | Types of ICT | Criteria for Inclusion in Phase |
|---------|---|--|
| Phase 1 | IT systems and applicationsInternet sites | IT systems/applications designed for use by <u>all</u> EPA employees EPA Internet sites designed for use by the public |
| Phase 2 | IT systems and applications Intranet sites Electronic documents | Internal IT systems/applications designed for use by <u>specific</u> EPA offices or groups of employees EPA intranet sites designed for use by <u>all</u> EPA employees Internal communication products designed to reach <u>all</u> EPA employees (e.g., training, emergency notifications) |

| Phase | Types of ICT | Criteria for Inclusion in Phase |
|---------|---|--|
| Phase 3 | IT systems and applications Intranet sites Electronic documents | EPA intranet sites designed for use by <u>specific</u> EPA offices or groups of employees Internal communication products designed to reach <u>specific</u> EPA offices or groups of employees (e.g., internal reports) IT systems/applications designed for use by the public |
| | documents | IT systems/applications designed for use by the public IT systems/applications designed for use by specific external communities |

During this activity, each EPA program/regional office is responsible for the following:

- Capturing the full universe of its ICT that meet the criteria for the phase
- Prioritizing for Section 508 assessment the ICT that is most critical to the organization, its employees and its internal and external stakeholders

The Section 508 Program will be pulling reports from the Registry of Environmental Applications and Databases (READ) for each EPA program/regional office at the beginning of each phase. The program/regional offices will review their READ report and determine if any additional ICT should be evaluated for section 508 compliance.

When prioritizing ICT for Section 508 assessments, organizations should consider the overall impact of the ICT to on the organization and its stakeholders. Factors to be considered may include, but are not limited to, the following:

- Whether the ICT is designed for use by the public
- Whether the ICT is essential to the organization's employees to complete their job duties
- Whether the ICT is needed to convey important information content to EPA employees or others

The Executive Council will review the proposed ICT inventories and priorities submitted by EPA program/regional offices and determine the final list of ICT that should be prioritized for Section 508 assessments within each phase.

The following table provides an overview of the ICT inventory and prioritization steps, including the actors responsible for each step in the process.

Table 2. Inventory Steps

| Step# | Activity | Responsible Actor |
|-------|--|---|
| 1 | Review the initial criteria defined in the plan for the phase and identify any revisions needed. | Section 508 Executive Council and Section 508 Program |
| 2 | Approve the final set of criteria for each phase. | Section 508 Executive Council |
| 3 | Issue a memorandum requesting that each EPA organization identify and submit a list of the ICT they have procured, developed or maintain that meet the specified criteria. | EPA CIO |
| 4 | Provide READ report of ICT based on specified criteria for each EPA program/regional office | EPA 508 Program |
| 5 | Compile each office's ICT inventory based on the specified criteria, after reviewing the READ report | Each EPA program/regional office |

| Step# | Activity | Responsible Actor |
|-------|---|--|
| 6 | Identify the ICT that should be given priority in | Each EPA program/regional offices, in consultation |
| | terms of assessing it for Section 508 | with the respective Section 508 Executive Council |
| | compliance and accessibility | member, IMO and SIO, as needed |
| 7 | Compile the full inventory of all ICT identified | Section 508 Program |
| | by EPA program/regional offices, and identify | |
| | the ICT that should be given priority for | |
| | Section 508 assessments | |
| 8 | Review the list of inventoried and prioritized | Section 508 Executive Council |
| | ICT and approve the final list of ICT for | |
| | assessment | |

Deliverables

- 1. Final phase criteria
- 2. Full phase inventory
- 3. Final list of ICT to be prioritized for Section 508 assessments

Activity 2: Assessment of EPA's ICT for Section 508 Compliance and Accessibility

EPA program/regional offices are responsible for completing assessments of their ICT, including funding for testing through support services.⁵

The following table provides an overview of the steps involved in the assessment process, including the actors responsible for each step in the process.

Table 3. Assessment Steps

| Step# | Activity | Responsible Office or Program |
|-------|--|-------------------------------------|
| 1 | Distribute the list of ICT to EPA program/regional offices | Section 508 Program |
| | for assessment | |
| 2 | Conduct Section 508 testing of the ICT that has been | All EPA program offices and regions |
| | prioritized for assessment | |
| 3 | Submit the Section 508 test results for each ICT that is | All EPA program offices and regions |
| | assessed to the Section 508 Program | |
| 4 | Review the Section 508 testing results, determine the | Section 508 Program |
| | extent to which the ICT is Section 508-compliant, and | |
| | document the findings | |

ICT that meets the Safe Harbor Provision, and for which documentation of compliance with the original Section 508 Standards is available, does not need to be reassessed. This documentation must include, but is not limited to, testing results. ICT that does not meet the Safe Harbor Provision will be assessed against the revised Section 508 standards.

Regardless of who conducts the testing or which standards apply, assessments must follow the <u>Harmonized</u> <u>Testing Process for Section 508 Compliance</u> developed by the U.S. Department of Homeland Security and the

⁵ Section 508 testing services are available through the following Working Capital Fund (WCF) services:

^{1.} Technical Support (TZ) – Use for access to the Web Development Team

^{2.} Technical Consulting (TC) – Use for access to the Assistive Technology Center (ATC)

U.S. Social Security Administration and the DHS Trusted Tester Program. In addition, <u>Appendix A. Assessment</u> <u>Results Templates</u> should be used to report the results of the assessment, in order to ensure the consistent application of the assessment criteria.

Definition of Compliance

The following table defines different levels of compliance, which will be used and reported as part of the assessment.

Table 4. Definitions of Compliance

| Rating | Definition | | |
|---------------------------|---|--|--|
| Fully Meets Standards | The product(s) fully meets all criteria. | | |
| Partially Meets Standards | All criteria are given "Meets," except at least one instance of "Partially meets" | | |
| | or "Does not meet." The comments do not indicate that an alternative means of | | |
| | accessing the information is available to successfully support the criterion. | | |
| Partially Meets Standards | All criteria are given "Meets," except at least one instance of "Partially meets" | | |
| through Equivalent | or "Does not meet," AND the comments indicate that an alternative means of | | |
| Facilitation | accessing the information is available to successfully answer the question. | | |
| Does Not Meet Standards | The product(s) does not meet any criteria. | | |

For all ICT that receive a rating less than Fully Meets, the responsible organization must document the steps EPA will take to bring the non-compliant ICT into compliance with Section 508 through **Remediation**.

Deliverables

1. Assessment results

Activity 3: Remediation of Section 508 Compliance and Accessibility Issues

All ICT that receives a rating of less than Fully Meets must document the steps EPA will take to bring the non-compliant ICT into compliance with latest Section 508 standards. Each program/regional offices should work with its Section 508 Executive Council member, Information Management Officer (IMO)/Information Resources Management Branch Chief (IRMBC) and Senior Information Official (SIO), as well as the Section 508 Program, when developing a remediation plan for an ICT.

The remediation plan should include the following information.

- Description of the issue
- Corrective actions to remediate the issue, which may include the identification of an alternative means
 of access, if the ICT cannot be fully remediated ⁶
- Timeline for implementation

Deliverables

1. ICT Remediation Plan(s)

⁶ "Alternative access" refers to another way of ensuring that data and information are made available to people with disabilities when an Agency would face a significant difficulty or expense (i.e., undue burden) in meeting applicable Section 508 standards.

Activity 4: Reporting on EPA's Section 508 Activities

All program/regional offices shall report on their organizations' progress to the Section 508 Program at least annually. The Section 508 Program will provide periodic updates to the Section 508 Executive Council and the CIO on the progress achieved within offices and across EPA. EPA program/regional office reports will also be used by the Section 508 Program to prepare the Agency's biannual reports to OMB.

Table 5. Compliance Report Summary

| ICT | Total | Number Evaluated | % Found in Compliance with Original Section 508 Standards | % Found in Compliance with Revised Section 508 Standards |
|-----------------------------|-------|---------------------|---|--|
| IT Systems and | | | | |
| Applications | | | | |
| Internet Sites | | | | |
| Intranet Sites | | | | |
| Electronic Documents | | | | |

Deliverables

- Phase Assessment Plan Report(s).
- EPA Section 508 OMB Report(s).

Roles and Responsibilities

The implementation of this Section 508 Compliance Assessment and Remediation Plan requires the engagement of all EPA organizations and many individuals, and their roles and responsibilities are outlined below.

EPA Section 508 Executive Council

- Provide input on the Section 508 Compliance Assessment and Remediation Plan
- Finalize criteria for ICT for each phase
- Communicate and coordinate activities within their respective program offices and regions
- Coordinate prioritization of their respective program/regional offices' ICT for Section 508 assessments
- Concur and approve their organization's ICT inventories
- Concur and approve respective program/regional offices' ICT remediation plans
- Provide status reports on respective program/regional offices' progress
- Concur and approve the findings of the Phase Reports

EPA Chief Information Officer

- Concur and approve the Section 508 Compliance Assessment and Remediation Plan
- Communicate about each phase of the plan, as appropriate
- Concur and approve the findings of the Phase Report(s)
- Concur and approve the Report to OMB

Senior Information Officials

- Coordinate activities within respective program/regional offices, as needed
- Concur and approve their respective organization's ICT inventories and prioritization of ICT for Section 508 assessments, including systems provided by other agencies
- Concur and approve remediation plans, including the requisite funding
- Provide guidance and concurrence in the development of needed ICT remediation plans

Provide status reports on respective program/regional offices' progress, as needed

Information Management Officers and Information Resources Management Branch Chiefs

- Perform implementation activities delegated by their SIO and Executive Council member
- Provide guidance and concurrence in the development of ICT remediation plans, as needed.
- Provide status reports on respective program/regional offices' progress, as needed.

OEI Office of Information Management (OIM)

- Assist and Coordinate Section 508 Compliance Assessment and Remediation Activities for the Internet and Intranet websites
- Establish a process for ensuring ongoing compliance

Section 508 Program

- Develop the Compliance Assessment and Remediation Plan
- Coordinate Section 508 Executive Council meetings
- Draft communications about the Compliance Assessment and Remediation Plan and implement, as appropriate
- Track the progress of each phase and report progress to the Section 508 Executive Council and the CIO
- Maintain a SharePoint site (or other easily accessible mechanism) to help track progress
- Assess and document ICT compliance based on testing results
- Coordinate the Section 508 compliance, assessment and remediation activities for the Internet and Intranet with OIM and the EPA Web Council
- Develop procedure for electronic documents to ensure Section 508 compliance
- Provide guidance and concurrence in the developing of needed ICT remediation plans
- Develop Phase Reports
- Develop EPA Section 508 OMB Reports

Section 508 Liaisons

- Act as the point of contact for staff implementing the Compliance Assessment and Remediation Plan activities within their respective organizations
- Assist the IMO/IRM BC, as needed, in implementing the Compliance Assessment and Remediation Plan activities
- Provide guidance and concurrence in the development of ICT remediation plans, as needed

ICT Owners

- Coordinate ICT assessments for each Phase
- Develop ICT remediation plans, as needed.

Working Capital Fund Testing Services (TC and TZ)

- Coordinate ICT assessments for each Phase
- Test ICT, as needed
- Provide testing results to ICT Owners

EPA Concurrence on this Plan

The Section 508 Program will discuss this plan with the CIO and the Section 508 Executive Council and seek their concurrence on the plan before broad-based implementation begins.

Plan Revision History

Table 6. Plan Revision History

| Version | Action | Date | Name |
|---------|-------------------|------|------|
| 1.0 | Strategy creation | | |

Appendix A: Assessment Results Templates

Test Checklist

| Test # | Requirements | Pass | Fail | N/A |
|-----------------|-----------------------------------|------|------|-----|
| 1. | Keyboard navigation | | | |
| 2. | Focus (visible) | | | |
| 3. | Focus (order) | | | |
| 4. | Focus (revealing hidden content) | | | |
| 5. | Skip-navigation links | | | |
| 6. | Multi-state components | | | |
| 7. | Images | | | |
| 8. | Color (meaning) | | | |
| 9. | Color (contrast) | | | |
| 10. | Flashing | | | |
| 11. | Forms (associated instructions) | | | |
| 12. | Page Titles | | | |
| 13. | Data Tables (headers) | | | |
| 14. | Data Tables (cell-header mapping) | | | |
| 15. | Headings | | | |
| 16. | Links and user controls | | | |
| 17. | Language | | | |
| 18. | Audio (transcripts) | | | |
| 18. | Video (descriptions) | | | |
| 20. | Synchronized media (captions) | | | |
| 21. | Synchronized media (descriptions) | | | |
| 22. | Style-sheet non-dependence | | | |
| 23. | Frames | | | |
| 24. | Alternate pages | | | |
| 25. | Time outs | | | |
| 26. | Image maps | | | |
| 27. | Plug-in Links | | | |
| Supplemental 1. | Sensory characteristics | | | |
| Supplemental 2. | Audio control | | | |
| Supplemental 3. | Pause, stop, hide | | | |
| Supplemental 4. | Multiple ways | | | |
| Supplemental 5. | Form automation | | | |
| Supplemental 6. | Error handling | | | |

Section 508 Standards Checklist

| Standard # | Section 508 Standard | Pass | Fail | N/A |
|------------|----------------------------------|------|------|-----|
| 21(a) | Keyboard Accessibility | | | |
| 21(b) | Built-in Accessibility Features | | | |
| 21(c) | Visual Focus | | | |
| 21(d) | Name, Role, State | | | |
| 21(e) | Bitmap Images | | | |
| 21(f) | Input Text | | | |
| 21(g) | OS Individual Display Attributes | | | |
| 21(h) | Animation | | | |
| 21(i) | No Color Dependence | | | |
| 21(j) | Variety of Color Selections | | | |
| 21(k) | Blinking Objects | | | |
| 21(I) | Forms | | | |
| 22(a) | Equivalent Text Descriptions | | | |
| 22(b) | Synchronized Alternatives | | | |
| 22(c) | No Color Dependence | | | |
| 22(d) | Readable Style Sheets | | | |
| 22(e) | Server-side image maps | | | |
| 22(f) | Client Side (not server) | | | |
| 22(g) | Identify Row and Column Headers | | | |
| 22(h) | Associate Data – Headers | | | |
| 22(i) | Frame Titles | | | |
| 22(j) | No Flickering | | | |
| 22(k) | Alternative versions | | | |
| 22(I) | Scripts | | | |
| 22(m) | Plug-ins | | | |
| 22(n) | Form Labels | | | |
| 22(o) | Skip Links | | | |
| 22(p) | Time Out Notification | | | |
| 24(c) | Captions | | | |
| 24(d) | Video Descriptions | | | |

WCAG 2.0 Standards Checklist

| Standard # | WCAG 2.0 Standard | Pass | Fail | N/A |
|----------------------------|-----------------------------------|------|------|-----|
| 1.1.1 | Non-text Content | | | |
| 1.2.1 | Audio-only and Video- only (pre- | | | |
| | recorded) | | | |
| 1.2.2 | Captions (pre-recorded) | | | |
| 1.2.3 | Audio Description or Media | | | |
| | Alternative (pre-recorded) | | | |
| 1.2.4 | Captions (live) | | | |
| 1.2.5 | Audio Descriptions (Pre-recorded) | | | |
| 1.3.1 | Info and Relationships | | | |
| 1.3.2 | Meaningful Sequence | | | |
| 1.3.3 | Sensory Characteristics | | | |
| 1.4.1 | Use of Color | | | |
| 1.4.2 | Audio Control | | | |
| 1.4.3 | Contrast (minimum) | | | |
| 2.1.1 | Keyboard | | | |
| 2.1.2 | No Keyboard Trap | | | |
| 2.2.1 | Timing Adjustable | | | |
| 2.2.2 | Pause, Stop, Hide | | | |
| 2.3.1 | Three Flashes or Below | | | |
| 2.4.1 | Bypass Blocks | | | |
| 2.4.2 | Page Titled | | | |
| 2.4.3 | Focus Order | | | |
| 2.4.4 | Link Purpose (In Context) | | | |
| 2.4.5 | Multiple Ways | | | |
| 2.4.6 | Headings and Labels | | | |
| 2.4.7 | Focus Visible | | | |
| 3.1.1 | Language of Page | | | |
| 3.1.2 | Language of Parts | | | |
| 3.2.1 | On Focus | | | |
| 3.2.2 | On Input | | | |
| 3.2.3 | Consistent Navigation | | | |
| 3.3.1 | Error Identification | | | |
| 3.3.2 | Labels or Instructions | | | |
| 3.3.3 | Error Suggestion | | | |
| 3.3.4 | Error Prevention | | | |
| 4.1.1 | Parsing | | | |
| 4.1.2 | Name, Role, Value | | | |
| Conformance Requirement #1 | Conforming Alternate Version | | | |
| Conformance Requirement #2 | Full Pages | | | |
| Conformance Requirement #3 | Complete Process | | П | |
| Conformance Requirement #4 | Only Accessibility Ways | | | |
| Conformance Requirement #5 | Non-Interference | | | |

Summary of Failures

| Page / Screen | Description of Issue |
|---------------|----------------------|
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